



May 30, 2017

Ex Parte Notice

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: *Connect America Fund, WC Docket No. 10-90*

Dear Ms. Dortch:

On Thursday, May 25, 2017, the undersigned, on behalf of NTCA–The Rural Broadband Association (“NTCA”), with Derrick Owens and Gerry Duffy on behalf of WTA-Advocates for Rural Broadband, Jeff Smith of GVNW Consulting, John Kuykendall of John Staurulakis, Inc., and Jim Frame of the National Exchange Carrier Association, spoke via conference call with Victoria Goldberg, Robin Cohn, and Edward Krachmer from the Wireline Competition Bureau.

During this conversation, we discussed reconsideration of Access Recovery Charge (“ARC”) imputation requirements for certain standalone broadband connections. *See Ex Parte* Letter from Michael R. Romano, Sr. Vice President, NTCA, to Marlene H. Dortch, Secretary, Federal Communications Commission (the “Commission”), WC Docket No. 10-90 (filed Feb. 3, 2017), at 3. We expressed support for the concept of exempting certain standalone broadband connections from the imputation requirement, subject to ensuring any such exemption would be properly targeted and limit potential adverse impacts on carriers that do not qualify for such an exemption. For example, as a safeguard, we suggested the Commission could consider “sunsetting” the ARC imputation exemption after five years, with the opportunity to renew it should it become clear that this exemption would not have a material adverse impact on universal service distributions over time.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Michael R. Romano

Michael R. Romano
Senior Vice President –
Industry Affairs & Business Development

cc: Victoria Goldberg
Robin Cohn
Edward Krachmer